

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Chapter 11
	§	
LUCA INTERNATIONAL GROUP LLC¹	§	CASE NO. 15-34221-H2-11
	§	
Debtors.	§	Jointly Administered
	§	Judge David R. Jones
	§	

**DEBTORS' EXPEDITED MOTION TO SELL A 2012 BX3 BMW FREE AND CLEAR
OF ALL LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS UNDER 11
U.S.C §§ 363 AND 105**

**A HEARING WILL BE CONDUCTED ON THIS MATTER ON OCTOBER 19, 2015 AT
2:00 P.M. IN COURTROOM 400, 4TH FLOOR, 515 RUSK, HOUSTON, TEXAS 77002.**

**IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING,
SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS
OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE
WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE DAYS
FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE
A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE;
OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND
GRANT THE RELIEF REQUESTED.**

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

**EXPEDITED CONSIDERATION OF THIS APPLICATION IS BEING REQUESTED. IF
THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU
WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE
REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EXPEDITED
CONSIDERATION IS NOT WARRANTED; YOU SHOULD FILE AN IMMEDIATE
RESPONSE.**

TO THE HONORABLE CHIEF UNITED STATES BANKRUPTCY JUDGE:

Luca International Group LLC ("LIG"), Luca International Group (Texas) LLC

¹ The Debtors in these cases, along with the last four digits of their respective taxpayer ID numbers, are Luca International Group LLC (1086), Luca Operation, LLC (0343), Luca International Group (Texas) LLC (5577), Luca Barnett Shale Joint Venture, LLC (5340), Luca Energy Fund LLC (0677), Luca Energy Resources, LLC (3896), Luca Resources Group, LLC (1699), Luca I, LP (4104), Luca II, LP, (9778), Luca Oil, LLC (8161), Luca To-Kalon Energy LLC (3922), Luca Oil II Joint Venture (6604).

(“LIGTX”), Luca Operation, LLC (“LOL”), Luca Barnett Shale Joint Venture, LLC (“LBSJV”), Luca Energy Fund LLC (“LEF”), Luca Energy Resources, LLC (“LER”), Luca Resources Group, LLC (“LRG”), Luca I, LP (“Luca I”), Luca II, LP (“Luca II”), Luca Oil, LLC (“Luca Oil”), Luca To-Kalon Energy, LLC (“LTKE”), and Luca Oil II Joint Venture (collectively “Debtors”), respectfully file this Expedited Motion (“Motion”) to sell a 2012 BX3 BMW, VIN 5UXWX5C51CL725473, (the “Vehicle”) pursuant to U.S.C. §§ 363 and 105 free and clear of liens, claims, encumbrances and other interests and in support thereof respectfully show the Court as follows:

SUMMARY OF EXPEDITED MOTION TO SELL THE VEHICLE AND BASIS FOR EXPEDITED CONSIDERATION

LRG owns the Vehicle and would like to sell it for the benefit of the creditors of the bankruptcy estate. Since the Debtors have significantly downsized its operations, the Vehicle is no longer needed. LRG currently has two (2) Appraisal Offers to purchase the Vehicle. The two (2) Appraisal Offers are from Texas Direct Auto for \$17,200, dated September 16, 2015, and CarMax for \$17,000, dated September 15, 2015. LRG also obtained an appraisal value from SIMS RTC for \$17,000. The Appraisal Offers from Texas Auto Direct and CarMax are only good for seven (7) days and have now expired; however, Debtors believes that the price received for the sale of the Vehicle will not substantially vary from the Appraisal Offers. Therefore, Debtors requests that the Vehicle be sold for \$16,500 or higher (“Sales Price”) to either Texas Direct Auto or CarMax. The sales price is a fair value for the Vehicle and the transaction is an arm’s length transaction to a purchaser who is not affiliated with the Debtors. The Debtors request expedited consideration of this Motion because the Vehicle is a depreciating asset with Appraisal Offers that are good for only seven (7) days. Accordingly, Debtors request to immediately sell the Vehicle for the benefit of the creditors of the bankruptcy estate.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and 11 U.S.C. 327(a). This is a core proceeding pursuant to 28 U.S.C. § 157.

2. Venue is proper in this district pursuant to t pursuant to 28 U.S.C. §§ 1408(1) and (2) and 11 U.S.C. § 101(2)(A).

I. BACKGROUND

3. The above captioned bankruptcy cases were each filed on August 6, 2015 (collectively “Petition Date”) under Chapter 11 of Title 11 of the Bankruptcy Code, 11 U.S.C. §§101 et seq. (the “Bankruptcy Code”).

4. Chief Restructuring Officer, Loretta Cross, was appointed by court order on August 10, 2015.

5. An order authorizing joint administration of these cases was entered on August 7, 2015 (Docket #18). No trustee or examiner has been appointed in the Debtors’ bankruptcy cases.

6. On August 24, 2015, an official committee of Equity Security Holders was established (the “Committee”).

7. A detailed factual background of the Debtors’ business and operations, as well as the commencement of these Chapter 11 cases, is more fully set forth in the *Affidavit of Loretta R. Cross in Support of the Debtors’ Chapter 11 Petitions and Requests for First-Day Relief* filed at Docket No. 16 and incorporated herein by reference. A brief summary of the factual background is listed below.

8. The Debtors are engaged in the exploration and production of natural gas, petroleum and related hydrocarbons. Bingqing Yang (“Yang”) organized and managed the Debtors prior to the

appointment of the Chief Restructuring Officer. Debtors obtained money from investors that was placed into various entities and were utilized in the operations of other entities.

9. The Debtors significantly downsized its operations since filing bankruptcy and have lost over 10 employees over approximately the past six months and four employees since the Petition Date.

10. During the pendency of this case, Debtors have streamlined operations and closed the office in California. As a result of the reduction in operations, Debtors have the Vehicle that is no longer required and the sale of which will provide value to the Debtors' estates.

11. LOL and LIG have a draft reserve report that was prepared in March 2015 by Gustavson Associates. The reserve report indicates that LOL has proved developed non-producing and proved behind pipe net reserves of approximately 3.2 billion cubic feet of gas and 450 thousand barrels of oil. The reserve report did not address proved undeveloped, probable or possible reserves.

12. LOL has a Reserve Estimate and Financial Forecast as of August 1, 2015 as to LOL's Interests in the Belle Grove #1 Well in Iberville Parish, Louisiana. This Report satisfies the DIP Lender's requirement that there be a showing of proved reserves in excess of \$4 million of which at least \$2.5 million are proved developed producing reserves.

13. On July 6, 2015, under Case No. 15-cv-03101, the Securities and Exchange Commission ("SEC") filed a lawsuit against several LUCA entities, including the Debtors, other Debtor affiliates, Yang and certain other individuals in the United States District Court of the Northern District of California, San Francisco Division ("SEC Lawsuit"). The SEC Lawsuit alleged securities fraud against the defendants for a scheme targeting the Chinese American community as well as investors in Asia to invest in the various unregistered offerings. There are

SEC allegations of funds being used for Bingqing Yang's personal expense. The SEC has sought the appointment of a receiver, and this matter remains pending.

14. In order to restore credibility to the operation, the Debtors, pursuant to various consents executed by Yang, retained Loretta R. Cross of Stout Risius Ross, Inc. as Chief Restructuring Officer (the "CRO" or "Ms. Cross") with full authority to operate the Debtors. Ms. Cross has served in that capacity since July 16, 2015.

II. RELIEF REQUESTED

15. Debtors request that an order be entered allowing the sale of the Vehicle for \$16,500 or higher to either Texas Auto Direct or CarMax.

16. LRG currently has two (2) Appraisal Offers to purchase the Vehicle. The two (2) Appraisal Offers are from Texas Direct Auto for \$17,200, dated September 16, 2015, and CarMax for \$17,000, dated September 15, 2015. LRG also obtained an appraisal value from SIMS RTC for \$17,000. Copies of all three appraisal documents are attached as Exhibit "A."

17. The Appraisal Offers from Texas Auto Direct and CarMax are only good for seven (7) days and have now expired; however, Debtors believes that the price received for the sale of the Vehicle will not substantially vary from the Appraisal Offers.

18. The Debtors believe that the proposed Sales Price is a fair value for the Vehicle and that selling the Vehicle for this price will maximize its value and be in the best interests of the Debtors and the Bankruptcy Estates. In addition, if the Vehicle is not sold, it will likely remain idle and depreciation will take its toll on the value of the property over time, which would ultimately reduce the sale price and amount recoverable by the estate.

19. The Debtors seek authority to sell the Vehicle free and clear of any lien, security interest, pledge, charge, encumbrance or restriction of any kind or nature ("Liens"). The Debtors

believe that selling the Vehicles is in the best interest of the estate. The Vehicle is a depreciating asset with Appraisal Offers that are good for only seven (7) days. Accordingly, Debtors request to immediately sell the Vehicle for the benefit of the creditors of the bankruptcy estate.

III. NO LIENS

20. Upon information and belief, there are no liens, claims or encumbrances against the Vehicle. A copy of the Certificate of Title is attached as Exhibit “B.”

IV. APPLICABLE AUTHORITY

21. Section 363(b)(1) of the Bankruptcy Code provides that “[t]he trustee, after notice and a hearing, may use, sell, or lease, other than in the ordinary course of business, property of the estate.” Approval of a proposed sale of the debtor’s assets outside of the ordinary course of business and prior to the confirmation of a plan of reorganization is appropriate if the court finds that sound business reasons justify the transaction. *See In re Abbotts Dairies of Pennsylvania*, 788 F.2d 143, 145-147 (3rd Cir. 1986); *In re Lionel Corp.*, 722 F.2d 1063, 1070 (2nd Cir. 1983).

22. For the foregoing reasons, the Debtors, in their best business judgment, assert that the sale of the Vehicle is in the best interests of the estate.

V. CONCLUSION

WHEREFORE, the Debtors pray that the Court (i) authorize the sale of the Vehicle for \$16,500 or higher to Texas Auto Direct or CarMax free and clear of all liens, claims, encumbrances, and other interests pursuant to U.S.C. §§ 363 and 105, (ii) and grant such other and further relief as is just and proper.

DATED: October 8, 2015

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ Brendetta A. Scott
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ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

This certifies that on October 8, 2015, the foregoing Debtors' Expedited Motion to Sell Property was served via email or the Court's electronic case filing notification system on the parties listed below:

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